Appendix B – Legal Authority

RESOLUTION NO. 014-16

1	COUNTY COUNCIL
2	OF
3	HARFORD COUNTY, MARYLAND
4	Resolution No. <u>014-16</u>
5	Legislative Session Day 16-016
6	May 10, 2016
7 8 9 10	Introduced by Council President Slutzky at the request of the County Executive
11 12	
13	A RESOLUTION providing for the approval of the Financial Assurance Plan, a copy of
14	which is attached hereto, for the Harford County national pollutant discharge elimination system
15	Phase I municipal separate storm sewer system permit and for submission of the Plan to the
16	Maryland Department of the Environment for its review.
17	

1	WHEREAS, Harford County has been issued a national pollutant discharge elimination
2	system Phase I municipal separate storm sewer system permit ("Permit") for discharges from its
3	storm drain outfalls; and
4	WHEREAS, the Annotated Code of Maryland, Environment Article, §4-202.1(j)(1)
5	requires that on or before July 1, 2016, and every 2 years thereafter on the anniversary of the date
6	of issuance of its Permit, a county must file a Financial Assurance Plan describing its projected
7	program for meeting permit requirements, including sources of revenue for the program; and
8	WHEREAS, the Annotated Code of Maryland, Environment Article, §4-202.1(j)(3)
9	provides that the Financial Assurance Plan may not be filed until the local governing body of the
10	county has held a public hearing and approved the Financial Assurance Plan.
11	NOW, THEREFORE, BE IT RESOLVED by the County Council of Harford County,
12	Maryland, that the Financial Assurance Plan is hereby approved and shall be submitted to the
13	Maryland Department of the Environment for its review.
	ATTEST:

Richard C. Slutzky

President of the Council

Mylia A. Dixon

Council Administrator

ADOPTED: June 21, 2016

Harford County NPDES Phase 1 MS4 Financial Assurance Plan

May 10, 2016

As required by the Annotated Code of Maryland ENV §4-202.1(j), Harford County has prepared the following Financial Assurance Plan ("FAP") which demonstrates the County's projected strategy for addressing the County's NPDES Phase I MS4 permit. By its nature, the FAP is a planning document. The County expressly reserves the right to make future changes to the FAP based on new or additional information or based on available funding consistent with an adaptive management approach.

<u>Background</u>

The Clean Water Act, significantly revised in 1972, established the National Pollutant Discharge Elimination System program ("NPDES") for facilities that discharge pollutants into navigable waters. Before discharging pollutants from a point source (for example, a pipe or outfall), a facility must apply for and receive an NPDES permit.

The 1987 Clean Water Act amendments updated the law to require permits for discharges from certain Municipal Separate Storm Sewer Systems ("MS4s"). Per federal regulations, MS4s serving a populations over 100,000 were required to submit a two-phase application for an individual five-year NPDES MS4 permit. This group of MS4s is called Phase I MS4s.

Maryland has been delegated the authority to run the NPDES program by the U.S. Environmental Protection Agency ("EPA"). The Maryland Department of the Environment ("MDE") is the state agency that oversees this delegated authority. Harford County received its first MS4 permit on May 17, 1994 and received reissued permits on August 13, 1999, November 1, 2004 and December 30, 2014.

Maryland House Bill 987, "Stormwater Management – Watershed Protection and Restoration Program", was approved in 2012 and codified into State law. This bill required all counties and municipalities subject to a Phase I MS4 permit to establish a stormwater remediation fee to fund the implementation of each jurisdiction's MS4 permit. Maryland Senate Bill 863, "Watershed Protection and Restoration Programs – Revisions", was approved in 2015 and codified into State law. This bill amended the Environment Code by (1) removing the requirement for each jurisdiction subject to a Phase I MS4 permit to establish a stormwater remediation fee and (2) adding the requirement for each jurisdiction to file a financial assurance plan.

Introduction

Harford County recognizes the need to improve water quality in the Chesapeake Bay and local Harford County streams. We also recognize through the NPDES MS4 permitting program, the responsibility of local governments to participate in the restoration of our waters.

Harford County, however, reiterated throughout the permit issuance process leading to the December 30, 2014 reissuance of our MS4 permit, that the permit requirements exceed Harford County's maximum extent practicable ("MEP"), considering both limited financial capabilities and short timeframes for implementation. MEP is the legal compliance standard for MS4s established by the Clean Water Act. This FAP should be read in the context of the County's continuing concern that its current MS4 permit demands a level of effort beyond legal requirements. The County expressly reserves its right to an MS4 permit that imposes no more than an MEP level of effort.

Program Capacity

Since the reissuance of Harford County's MS4 permit, the County has increased both staff and financial capacity for the implementation of the MS4 program.

The MS4 program is administered through the Department of Public Works, Office of Watershed Restoration and Protection, with support from other departments throughout the County government including capital project managers from highways engineering. Additionally, Harford County utilizes various partnerships with outside agencies such as Maryland Department of Natural Resources and U.S. Geological Survey to accomplish permit requirements.

In addition to increased staff capacity, Harford County continues to utilize and expand the use of open-end contracts for design and design / build in order to complete watershed restoration projects as quickly as is practicable. Focusing watershed restoration projects on County-owned properties will likewise assist in this regard.

In February 2015, the County Council passed Resolution 005-15 to dedicate a portion of the County's recordation tax in the amount of \$1.10 per \$1,000 of consideration beginning with fiscal year 2017 to be dedicated to the implementation of watershed protection and restoration projects. Most of the dedicated funds will be used to pay debt services for future bonds.

Prior to FY2016, the County had no dedicated funding source for the implementation of capital improvement projects for the MS4 program. With the establishment of a dedicated funding source and a commitment to issue bonds, a systematic strategy for addressing the requirements of the MS4 program and more specifically the watershed restoration component

of the MS4 permit has begun. This level of dedicated funding also allows for the design and construction of larger scale restoration projects that can benefit from economies of scale to maximize restoration benefits per cost.

A summary of the capital budgets for the implementation of the MS4 permit for approved FY2016 and the next two proposed fiscal years is listed below.

	Approved FY2016	Proposed FY2017	Proposed FY2018
Paygo ¹	\$0.14 M	\$0.15 M	\$0.15 M
Future Bonds ²	\$5.8 M	\$5.9 M	\$5.95 M
Proposed Grants	\$2.85 M	\$4 M	\$4 M
Total	\$8.79 M	\$10.05 M	\$10.1 M

Footnotes:

Within the General Fund, thirteen (13) full time positions are proposed for FY2017 for the implementation of the MS4 program including the following:

<u>Staff Funded under the Watershed Protection and Restoration Program - \$1.3 M</u>

MS4 Office - 4

Stormwater Plans Review and Inspections – 8
Erosion and Sediment Control Plans Review – 1

The budgets discussed above do not include the full costs to implement the MS4 permit. Many of the programs required under the MS4 permit exist within other county departments and divisions such as property management, pollution prevention, and litter and floatables, to mention a few. In addition, future grants have not been secured but are rather estimates of grant awards based projected availability.

¹ Source of funding is recordation tax

² Debt services on future bonds to be paid from recordation tax

Impervious Area Assessment

In December 2015, as required in Part IV E.2.a. of the MS4 permit, the County submitted an impervious surface area assessment consistent with the methods described in the MDE document "Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated, Guidance for National Pollutant Discharge Elimination System Stormwater Permits" (MDE, June 2011).

Part 1.B of the MS4 permit correctly defines the MS4 permit area. Outside of the permit, MDE has expressed a more expansive interpretation of the regulated permit area. The County's assessment was conservatively based on MDE's interpretation. However, the County expressly reserves its rights to reduce the acreage associated with the impervious surface area assessment in Part IV.E.2.a. of the permit, which in turn impacts the County's restoration efforts during this permit term under Part IV.E.2.a, to the minimum acreage required by the permit. The County expressly reserves its rights to make refinements to its assessment as necessary in the future based upon new or additional information consistent with an adaptive management approach.

Furthermore, the County made no representation by submittal of the assessment that 20% of the acreage identified can be restored in the manner provided in Part IV.E.2.a considering financial capabilities and the short timeframes specified in Part IV.E.2.a. for the magnitude of work which the County maintains exceeds the legally-authorized maximum extent practicable (MEP) level of effort for the term of the permit. As noted above, the County expressly reserves its right to an MS4 permit that imposes no more than an MEP level of effort.

Based on the assumptions outlined in the assessment, the County determined 9,413 acres of impervious area remained untreated through the end of the previous permit which expired in 2009. Therefore, the impervious surface restoration requirement for 20% is 1,883 impervious acres.

On April 6, 2016, MDE provided comments and requested additional information from the County they deemed necessary to approve the County's impervious area assessment. As directed, Harford County will provide a response to their comments by August 1, 2016.

For the purposes of this financial assurance plan, Harford County has used 9,413 acres of impervious surfaces as untreated. The following represents the County's progress towards addressing watershed restoration for 20% of the untreated impervious surfaces.

	Acres
Untreated Impervious Surfaces	9,413
20% Requirement	1,883
Watershed Restoration (2009 through 2015)	-73
Watershed Restoration (1/1/16 throughFY2016	-59
Balance (through 5/10/2016)	1,751

Based on the County's estimated cost per impervious acre of \$55,000, the cost to implement watershed restoration for an additional 1,751 acres is approximately \$96 M for the 4 remaining years of the permit, or \$24 M annually. As discussed in the County's MEP analysis, this level of spending exceeds the County's ability to fund the program through the general fund or fund the program through bond sales.

Harford County's Maximum Extent Practicable

The County's MEP analysis was submitted to MDE for consideration during the comment period for the tentative determination for the County's permit. This analysis determined the County can complete watershed restoration for 10% of the untreated impervious surfaces, or 941 acres based on financial capabilities and short timeframes. As listed above, the County has completed 182 acres, leaving a balance of 759 acres. The estimated cost to implement watershed restoration for 759 acres is approximately \$42 M for the 4 remaining years of the permit, or \$10.4 M annually. The following table provides a tentative schedule for implementation of watershed restoration projects.

	Acres
Watershed Restoration (2009 through 2016)	175
Watershed Restoration (FY2017)	68
Watershed Restoration (FY2018)	256
Watershed Restoration (FY2019)	247
Watershed Restoration (FY2020)	195
Total	941

Septic Systems

Harford County has also proposed alternative watershed restoration credits for connecting septic systems to the wastewater treatment plant and upgrading septic systems for denitrification. These programs are administered by the Harford County Health Department and fulling funded with Bay Restoration Funds. The following table provides a tentative schedule for implementation of these projects.

	Acres
Septic connections and upgrades (2009 through 2016)	112
Septic connections and upgrades (FY2017)	11
Septic connections and upgrades (FY2018)	11
Septic connections and upgrades (FY2019)	11
Septic connections and upgrades (FY2020)	11
Total	156

Additionally, Harford County has listed the annual practice of septic system pumping for 300 impervious acres. This represents an average annual volume of 10 million gallons delivered to the wastewater treatment plant from septic haulers.

Nutrient Trading

MDE is currently working with the Maryland Water Quality Trading Advisory Committee (WQTAC) to develop a *Water Quality Trading Manual*, which will include guidelines for MS4s to participate in nutrient trading to comply with impervious surface area restoration permit requirements. One scenario includes trading with the County's wastewater treatment plant (WWTP). Harford County is proposing to use a WWTP credits to address the remaining watershed restoration for 10% watershed restoration for untreated impervious surfaces. This would be a temporary trade to allow the County to continue to build program capacity and complete projects within more realistic timeframes.

Summary

Harford County has proposed a capital improvement program through the end of the MS4 permit term to address watershed restoration for 10% of the untreated impervious surface. An additional 1.7% from septic upgrades or connection to the wastewater treatment plant and 3% from annual septic pumping. An additional 10% will be proved through nutrient trading with the County's wastewater treatment plant. Enclosed are the spreadsheets developed by MDE for submittal of the financial assurance plan.

Article 4-202.1(j)(1)(i)1: Actions that will be required of the county or municipality to meet the requirements of its National Pollutant Discharge Elimination System Phase I Municipal Separate Storm Sewer System Permit.

Untreated impervious surfaces (acres) or

baseline: 9,413

Impervious Surface Restoration Plan (ISRP) Requirement

20%

RESTORATION TYPE	BMP CLASS	IMPERVIOUS ACRES	COST ^{2,3}	% ISRP COMPLETE	STATUS	PROJECTED YEAR ¹			
Operation Programs									
(SEPP) Septic Pumping	А	300	\$0	3.2%	Under Construction	2016			
(SEPP) Septic Pumping	А	300	\$0	3.2%	Planning	2017			
(SEPP) Septic Pumping	А	300	\$0	3.2%	Planning	2018			
(SEPP) Septic Pumping	А	300	\$0	3.2%	Planning	2019			
(SEPP) Septic Pumping	А	300	\$0	3.2%	Planning	2020			
Average Operations Next Two Years (FY2017-FY2018)		300.0	\$0	3.2%					
Average Operations Permit Term (FY2009-FY2020)		310.8	\$0	3.3%					

Capital Projects								
(STRE) Stream Restoration	А	38	\$1,150,000	0.4%	Under Construction	2016		
(SEPC) Septic Connections to WWTP	А	2.3	N/A	0.0%	Under Construction	2016		
(SEPD) Septic Denitrification	А	9.1	N/A	0.1%	Under Construction	2016		
(STRE) Stream Restoration	А	30	\$1,450,000	0.3%	Under Design	2017		
(PMED / PWED / WEDW / WSHW) Stormwater Retrofit	S	23	\$1,410,000	0.2%	Under Design	2017		
(FPU) Tree Plantings	А	15	\$500,000	0.2%	Planning	2017		
(SEPC) Septic Connections to WWTP	А	3.2	N/A	0.0%	Planning	2017		
(SEPD) Septic Denitrification	А	7.8	N/A	0.1%	Planning	2017		
(STRE) Stream Restoration	А	185	\$11,080,000	2.0%	Under Design	2018		
(PMED / PWED / WEDW / WSHW) Stormwater Retrofit	S	13	\$700,000	0.1%	Under Design	2018		
(PMED / PWED / WEDW / WSHW) Stormwater Retrofit	S	43	\$2,400,000	0.5%	Planning	2018		
(FPU) Tree Plantings	А	15	\$500,000	0.2%	Planning	2018		
(SEPC) Septic Connections to WWTP	А	3.2	N/A	0.0%	Planning	2018		

(SEPD) Septic Denitrification	А	7.8	N/A	0.1%	Planning	2018
(STRE) Stream Restoration	А	87	\$2,505,000	0.9%	Under Design	2019
(STRE) Stream Restoration	А	85	\$4,700,000	0.9%	Planning	2019
(PMED / PWED / WEDW / WSHW) Stormwater Retrofit	S	60	\$3,300,000	0.6%	Planning	2019
(FPU) Tree Plantings	А	15	\$500,000	0.2%	Planning	2019
(SEPC) Septic Connections to WWTP	А	3.2	N/A	0.0%	Planning	2019
(SEPD) Septic Denitrification	А	7.8	N/A	0.1%	Planning	2019
(STRE) Stream Restoration	А	100	\$5,500,000	1.1%	Planning	2020
(PMED / PWED / WEDW / WSHW) Stormwater Retrofit	S	80	\$4,400,000	0.8%	Planning	2020
(FPU) Tree Plantings	А	15	\$500,000	0.2%	Planning	2020
(SEPC) Septic Connections to WWTP	А	3.2	N/A	0.0%	Planning	2020
(SEPD) Septic Denitrification	А	7.8	N/A	0.1%	Planning	2020
Subtotal Capital Next Two Years (FY2017-FY2018)		346	\$18,040,000	2.8%		
Subtotal Capital Permit Term (FY2009-FY2020)		1028.3	\$46,388,000	10.9%		

Other								
Nutrient Trading with WWTP	940	\$0	10.0%					
Subtotal Other Next Two Years (FY2017-FY2018)	940	\$0	10.0%					
Subtotal Other Permit Term (FY2009- FY2020)	940	\$0	10.0%					
Total Next Two Years (FY2017-FY2018)	1586.0	\$18,040,000	16.0%					
Total Permit Term (FY2009-FY2020)	2279.1	\$46,388,000	24.2%					

¹ Projected year is the year the project is constructed

² Cost is the total cost for the project including planning, design, and construction

³ Cost is not related to annual fiscal costs. Planning, design, and construction typically do not occur within a single fiscal year.

Article 4-202.1(j)(1)(i)2: Projected annual and 5-year costs for the county or municipality to meet the impervious surface restoration plan (ISRP) requirements of its National Pollutant Discharge Elimination System Phase I Municipal Separate Storm Sewer System Permit.

	PAST	CURRENT	PROJECTED	PROJECTED	PROJECTED	PROJECTED	
DESCRIPTION	UP THRU	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	TOTAL
	FY 2015 ¹	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	COSTS
Operating Expenditures							
Street Sweeping Program							\$0
Inlet Cleaning							\$0
Support of Capital Projects		\$100,000	\$150,000	\$200,000	\$250,000	\$300,000	\$1,000,000
Debt Service Payment			\$100,000	\$690,000	\$1,270,000	\$1,800,000	\$3,860,000
Other							\$0
Capital Expenditures							
General Fund							\$0
WPR Fund		\$3,810,000	\$3,351,000	\$8,850,000	\$7,000,000	\$8,000,000	\$31,011,000
Debt Service							\$0
Grants & Partnerships		\$1,508,000	\$2,330,000	\$4,600,000	\$4,000,000	\$4,000,000	\$16,438,000
Other							\$0

Subtotal operation & paygo	\$3,910,000	\$3,601,000	\$9,740,000	\$8,520,000	\$10,100,000	\$35,871,000
Total Expenditures	\$5,418,000	\$5,931,000	\$14,340,000	\$12,520,000	\$14,100,000	\$52,309,000

Total ISRP costs except debt service: \$48,449,000

Compare ISRP costs (except debt service) / total ISRP proposed actions: 104.44%

¹ Harford County has not provided this information because it is beyond the requirements of the statute

Article 4-202.1(j)(1)(i)3: Projected annual and 5-year revenues or other funds that will be used to meet the cost for the county or municipality to meet the impervious surface restoration plan requirements under the National Pollutant Discharge Elimination System Phase I Municipal Separate Storm Sewer System Permit.

DESCRIPTION	PAST UP THRU FY 2015 ¹	CURRENT YEAR 1 FY 2016	PROJECTED YEAR 2 FY 2017	PROJECTED YEAR 3 FY 2018	PROJECTED YEAR 4 FY 2019	PROJECTED YEAR 5 FY 2020	TOTAL NEXT 2-YEARS FY 17-18*	TOTAL
Annual Revenue Appropriated for ISRP ²		\$9,750,000	\$11,400,000	\$11,550,000	\$11,750,000	\$11,950,000	\$22,950,000	\$56,400,000
Annual Costs towards ISRP ²		\$5,418,000	\$5,931,000	\$14,340,000	\$12,520,000	\$14,100,000	\$20,271,000	\$52,309,000

Compare annual costs / revenue appropriated:

Reporting Criteria 75%

88%

¹ Harford County has not provided this information because it is beyond the requirements of the statute

² Impervious Surface Restoration Plan (ISRP) VERSION 4-7-16

Article 4-202.1(j)(1)(i)4: Any sources of funds that will be utilized by the county or municipality to meet the requirements of its National Pollutant

Discharge Elimination System Phase I Municipal Separate Storm Sewer System Permit.

SOURCE	PAST UP THRU FY 2015 ¹	CURRENT YEAR 1 FY 2016	P	PROJECTED YEAR 2 FY 2017	F	PROJECTED YEAR 3 FY 2018	P	PROJECTED YEAR 4 FY 2019	P	ROJECTED YEAR 5 FY 2020	TOTAL PERMIT CYCLE
Paygo Sources											
Stormwater Remediation Fees (WPR Fund)											\$ -
Miscellaneous Fees (WPR Fund)											\$ -
General Fund (Salaries)		\$ 1,100,000	\$	1,500,000	\$	1,600,000	\$	1,700,000	\$	1,800,000	\$ 7,700,000
Other Funds 1 (Recordation Tax)		\$ 140,000	\$	150,000	\$	150,000	\$	150,000	\$	150,000	\$ 740,000
Other Funds 2											\$ -
Other Funds 3											\$ -
Subtotal Paygo Sources	\$ -	\$ 1,240,000	\$	1,650,000	\$	1,750,000	\$	1,850,000	\$	1,950,000	\$ 8,440,000

Debt Service							
County Transportation Bonds							\$ -
General Obligation Bonds	\$	5,800,000	\$ 5,900,000	\$ 5,950,000	\$ 6,050,000	\$ 6,150,000	\$ 29,850,000
Revenue (Utility) Bonds							\$ -
State Revolving Loan Fund							\$ -
Public-private partnership (debt service)							\$ -
Subtotal Debt Service	\$	5,800,000	\$ 5,900,000	\$ 5,950,000	\$ 6,050,000	\$ 6,150,000	\$ 29,850,000
Grants and Partnerships							
State funded grants	\$	2,325,000	\$ 2,700,000	\$ 2,700,000	\$ 2,700,000	\$ 2,700,000	\$ 13,125,000
Federal funded grants	\$	525,000	\$ 1,300,000	\$ 1,300,000	\$ 1,300,000	\$ 1,300,000	\$ 5,725,000
Public-private partnership (matched grant)							\$ -
Subtotal Grants and Partnerships	\$	2,850,000	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000	\$ 18,850,000

Total Annual Sources of Funds ³	\$ -	\$ 9,890,000	\$ 11,550,000	\$ 11,700,000	\$ 11,900,000	\$ 12,100,000	\$ 45,040,000
Percent of Funds Directed Toward ISRP ²		99%	99%	99%	99%	99%	

Compare total permit term paygo ISRP² costs / subtotal permit term paygo sources: 305%

Compare total permit term ISRP² costs / total permit term annual sources of funds: 116%

¹ Harford County has not provided this information because it is beyond the requirements of the statute

² Impervious Surface Restoration Plan (ISRP)

³ Funding excludes programs or portions of programs required outside of the MS4 permit such as illicit discharges, litter and floatables, property management and public education.

Article 4-202.1(j)(1)(i)5: Specific actions and expenditures that the county or municipality implemented in the previous fiscal years to meet its impervious surface restoration plan requirements under its National Pollutant Discharge Elimination System Phase I Municipal Separate Storm Sewer System Permit.

Untreated impervious surfaces (acres) or baseline: 9,413 Impervious Surface Restoration Plan (ISRP) Requirement: 20%

RESTORATION ID	RESTOR TYPE	BMP CLASS	NUM BMP	IMPERV ACRES	BUILT DATE	COST	% ISRP Complete	STATUS	COMMENTS
Operation Programs									
Septic Pumping	SEPP	Α	9,926	298	2015	\$0	3.2%	Complete	
Septic Pumping	SEPP	А	9,811	294	2014	\$0	3.1%	Complete	
Septic Pumping	SEPP	Α	9,719	292	2013	\$0	3.1%	Complete	
Septic Pumping	SEPP	Α	9,887	297	2012	\$0	3.2%	Complete	
Septic Pumping	SEPP	Α	11,482	344	2011	\$0	3.7%	Complete	
Septic Pumping	SEPP	А	12,959	389	2010	\$0	4.1%	Complete	

Septic Pumping	SEPP	А	10,511	315	2009	\$0	3.3%	Complete	
Average Operations Complete To Date			10,614	318		\$0	3.4%		
Capital Projects									
Retrofit of existing stormwater pond	WPWS	S	1	9.8	2016	\$590,000	0.1%	Complete	
Stream restoration	STRE	А	1	19.6	2016	\$600,000	0.2%	Complete	
Retrofit of existing stormwater pond	WPWS	S	4	8.4	2016	\$250,000	0.1%	Complete	
Retrofit of existing stormwater pond	PMED	S	1	12	2016	\$390,000	0.1%	Complete	
New bioretention facility	FBIO	S	1	0.6	2015	\$100,000	0.0%	Complete	
Retrofit of existing stormwater pond	MSGW	S	1	0.5	2015	\$82,000	0.0%	Complete	
Stream restoration	STRE	А	1	12.4	2015	\$550,000	0.1%	Complete	
Septic Connection to WWTP	SEPC	А	4	1.6	2015	N/A	0.0%	Complete	Funded Bay Restoration Fund
Installation of new BAT on existing septic Denitrification	SEPD	А	39	10.1	2015	N/A	0.1%	Complete	Funded Bay Restoration Fund

Tree planting	FPU	А	3	1.8	2014	\$50,000	0.0%	Complete	
Stream restoration	STRE	А	1	12.1	2014	\$570,000	0.1%	Complete	
Tree planting	FPU	А	4	3.2	2014	\$81,000	0.0%	Complete	
Septic Connection to WWTP	SEPC	А	2	0.8	2014	N/A	0.0%	Complete	Funded Bay Restoration Fund
Installation of new BAT on existing septic Denitrification	SEPD	А	43	11.2	2014	N/A	0.1%	Complete	Funded Bay Restoration Fund
Retrofit of existing stormwater pond	WEDW	S	1	3.8	2013	\$240,000	0.0%	Complete	
Tree planting	FPU	А	4	1.8	2013	\$56,000	0.0%	Complete	
Retrofit of existing stormwater pond	WEDW	S	1	4.8	2013	\$320,000	0.1%	Complete	
Stream restoration	STRE	А	1	7.3	2013	\$320,000	0.1%	Complete	
Tree planting	FPU	А	1	0.8	2013	\$24,000	0.0%	Complete	
Septic Connection to WWTP	SEPC	А	1	0.4	2013	N/A	0.0%	Complete	Funded Bay Restoration Fund
Installation of new BAT on existing septic Denitrification	SEPD	А	23	6	2013	N/A	0.1%	Complete	Funded Bay Restoration Fund

	_							-	
Septic Connection to WWTP	SEPC	А	1	0.4	2012	N/A	0.0%	Complete	Funded Bay Restoration Fund
Installation of new BAT on existing septic Denitrification	SEPD	А	8	2.1	2012	N/A	0.0%	Complete	Funded Bay Restoration Fund
Retrofit of existing stormwater pond	WPWS	S	1	11.7	2011	\$520,000	0.1%	Complete	
Stream restoration	STRE	А	1	4.7	2011	\$220,000	0.0%	Complete	
New bioretention facility	FBIO	S	1	0.9	2011	\$160,000	0.0%	Complete	
New bioretention facility	STRE	А	1	0.6	2011	\$180,000	0.0%	Complete	
Stream restoration	STRE	А	1	16.8	2011	\$380,000	0.2%	Complete	
Demolition of townhouse community	IMPP	А	1	2.1	2011	N/A	0.0%	Complete	Costs not available
New bioretention facility	FBIO	S	1	0.6	2010	\$110,000	0.0%	Complete	
Subtotal Capital Complete To Date			154	168.9		\$5,793,000	1.79%		
Other									
							0.0%		

					0.0%	
Subtotal Other Complete To Date		0	0	\$0	0.0%	
Total Complete to Date		10,768	487.3	\$5,793,000	5.2%	